

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT
BARNSTABLE SS

FILED JUL 11 2019

BARNSTABLE, ss.

SUPERIOR COURT DEPARTMENT *of the Superior Court*
Civil Action No. *1901CV0353*

COMMONWEALTH OF MASSACHUSETTS
Plaintiff

COMPLAINT FOR FORFEITURE

vs.

FIVE THOUSAND SIX HUNDRED SIXTY-FIVE DOLLARS AND FORTY-FIVE CENTS
(\$5,665.45) U.S. CURRENCY
Defendant

1. The plaintiff is the Commonwealth of Massachusetts.
2. This complaint is brought in the name of the Commonwealth of Massachusetts by the District Attorney of the Cape and Islands District seeking an order of forfeiture of the defendant pursuant to M.G.L. Chapter 94C, Section 47.
3. FIVE THOUSAND SIX HUNDRED SIXTY-FIVE DOLLARS AND FORTY-FIVE CENTS, (\$5,665.45) U.S. CURRENCY, seized on May 23, 2019 from the property of LUIS F. MARTINEZ, DOB: 12/06/1979, Criminal Docket #: 1926CR00431.
4. The circumstances surrounding said seizure are contained within the attached affidavit, which is hereby incorporated by reference.
5. The defendant was used or intended for use to facilitate the distribution or possession with intent to distribute a controlled substance in violation of this chapter.

WHEREFORE, the plaintiff prays:

1. That notice issue to persons who appear to have an interest in the defendant to appear on its behalf as follows:

a. Notice by certified or registered mail be given by the Commonwealth as provided in M.G.L. Chapter 94C, Section 47 (d).

2. That the matter be set down for a hearing.

3. That after hearing, the Court issue an order forfeiting the defendant to the District Attorney's Office in behalf of the Commonwealth.

For the Commonwealth,

Michael O'Keefe
District Attorney
Cape & Islands District

By: 

Michael Donovan
Assistant District Attorney

Dated: July 10, 2019